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Attorneys for Nominal Defendant
CHINA NORTH EAST PETROLEUM
HOLDINGS LIMITED

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JUDITH STRICKLAND, Derivatively On
Behalf of Nominal Defendant CHINA
NORTH EAST PETROLEUM HOLDINGS
LIMITED,

Plaintiff,

v.

WANG HONGJUN, YU LIGUO, ROBERT C.
BRUCE, EDWARD M. RULE, LI JINGFU,
ZHANG YANG DIO, JU GUIZHI,

Defendants,

- and -

CHINA NORTH EAST PETROLEUM
HOLDINGS LIMITED,

Nominal Defendant.

C.A. No. 1:10-cv-05445 (MGC)
ECF Case

[Captions continued on following page]

SHERWIN DROBNER,

Plaintiff,

v.

WANG HONGJUN, ROBERT C. BRUCE,
EDWARD M. RULE, LI JINGFU, YU LIGUO,
JU GUIZHI, ZHANG YANG DIO,

Defendants,

- and -

CHINA NORTH EAST PETROLEUM
HOLDINGS LIMITED,

Nominal Defendant.

C.A. No. 1:10-cv-06319 (RMB)

JONO NICOLN, derivatively on behalf of
CHINA NORTH EAST PETROLEUM
HOLDINGS LIMITED,

Plaintiff,

v.

WANG HONGJUN, ZHANG YANG DIO, JU
GUIZHI, YU LIGUO, ROBERT BRUCE,
EDWARD RULE, RUISHI HU, and LI
JINGFU,

Defendants,

- and -

CHINA NORTH EAST PETROLEUM
HOLDINGS LIMITED,

Nominal Defendant.

C.A. No. 1:10-cv-06344 (RMB)

NOMINAL DEFENDANTS' NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the accompanying declaration of Michael J. Coffino dated April 20, 2011 and the exhibits attached to the declaration, this notice, the

accompanying memorandum of law in support of this motion, any subsequent submissions that shall be made in support of this motion, and all prior proceedings, the undersigned, on behalf of Nominal Defendant, China North East Petroleum Holdings Limited, will move this Court, before the Honorable Miriam G. Cedarbaum, at the United States Courthouse, 500 Pearl Street, New York, New York, at 10:00 a.m. on May 19, 2011, to dismiss the Verified Amended Shareholder Derivative Complaint, in its entirety and with prejudice, pursuant to Federal Rules of Civil Procedure 12(b)(6) and 23.1.

Dated: April 20, 2011

Respectfully submitted,

THE CRONE LAW GROUP

By: /s/ Michael J. Coffino

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